

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

DONALD J. TRUMP FOR
PRESIDENT, INC.; LAWRENCE
ROBERTS; and DAVID JOHN
HENRY;

Plaintiffs,

v.

KATHY BOOCKVAR, in her capacity
as Secretary of the Commonwealth of
Pennsylvania; ALLEGHENY
COUNTY BOARD OF ELECTIONS;
CENTRE COUNTY BOARD OF
ELECTIONS; CHESTER COUNTY
BOARD OF ELECTIONS;
DELAWARE COUNTY BOARD OF
ELECTIONS; MONTGOMERY
COUNTY BOARD OF ELECTIONS;
NORTHAMPTON COUNTY BOARD
OF ELECTIONS; and
PHILADELPHIA COUNTY BOARD
OF ELECTIONS;

Defendants.

Civil Action

No.: 4:20-cv-02078-MWB

DECLARATION OF TERRI E. GRIFFIN

Pursuant to 28 U.S.C. § 1746, I, Terrie E. Griffin, hereby declare as follows:

1. I have personal knowledge of the matters stated herein and would testify to the same if called as a witness in Court.
2. I am over eighteen years of age and am otherwise competent to testify. [L]
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3. I am the Co-President of the League of Women Voters of Pennsylvania. I have served in that role since June 2019.
4. I am also a member of the League of Women Voters of Allegheny County and have served on their board for several years and served as chair of the membership committee.
5. League of Women Voters of Pennsylvania (“LWV-PA”) is a nonpartisan nonprofit organization that encourages the informed and active participation of citizens in government, works to increase understanding of major public policy issues, and influences public policy through education and advocacy.
6. LWV-PA supports full voting rights for all eligible citizens and opposes efforts to build barriers to exercise this right.
7. LWV-PA has approximately 2,373 members. Most of those members are eligible to vote in Pennsylvania.
8. This includes approximately a total of 184 members in Montgomery County; 391 members in Allegheny County; 89 members in Philadelphia County; 309 members in Delaware County; 66 members in Centre County; and 52 members in Northampton County.
11. Many of these LWV-PA members are qualified voters who cast vote by mail and absentee ballots adhering to all guidance provided to them. These members, including those named below, are at risk of disenfranchisement in this election if mail-in ballots cast by qualified electors were discarded.
12. Additionally, LWV-PA’s members include voters at risk of disenfranchisement in this election if mail-in ballots cast by qualified electors and accompanied by signed declarations were discarded if the declaration contained minor errors.

13. I am League member myself and I live in Allegheny County Pennsylvania. I voted by mail. I requested on mail ballot and returned it in-person to my county Board of Election offices before Election Day. My ballot was accepted without any issues.

14. Elizabeth Tinker is also a LWPA member. She lives in Philadelphia. She voted by mail and her mail ballot was accepted without any issues.

15. Mary Grice is another member of LWVPA. She is lives in Philadelphia County. She is 89 years old, has been voting for 68 years, and has Type-2 Diabetes, so she is at high risk of serious complications from COVID-19. Ms. Grice voted by mail. On November 1, she received a call notifying her ballot had a defect, so she went to the Liacouras Center to receive and fill out a replacement ballot.

16. LWV-PA works in areas of voter registration, election protection, voter education, get out the vote, and grassroots mobilization around voting rights.

17. With respect to the 2020 election, LWV-PA's voter outreach efforts have included providing education to voters on how to cast mail-in and absentee ballots. In preparation for the November 3 election, LWV-PA has built and delivered educational tools and programs and has run marketing and awareness campaigns to educate voters about recent changes to Pennsylvania election procedures for mail in and absentee ballots. Among other issues, LOWV has been informing its members and members of the public about the signature requirement for the declarations accompanying mail-in ballots. This effort also included educating voters about correcting minor mistakes on mail-in ballots; educating voters about various options provided under Pennsylvania election law including the option to vote provisionally if a voter never received a ballot, to vote provisionally if the voter was concerned that their ballot would not be timely received by the county board of elections; or to vote in person by spoiling their mail ballot at the poll.

18. LWV-PA has an interest in preventing the disenfranchisement of eligible voters who properly cast mail-in ballots accompanied by signed declarations but who made minor errors on the declarations, including its members and voters it may have assisted in navigating the mail-in voting process.

19. LWVPA has an interest in preventing the disenfranchisement of any eligible voters who properly cast mail-in ballots including its members and voters it may have assisted in navigating the mail-in voting process.

20. Discarding ballots cast by qualified electors and accompanied by signed

declarations merely because the declarations contained minor errors would effectively disenfranchise Pennsylvania voters who cast such ballots, which would harm LWV-PA's mission of supporting full voting rights for all eligible citizens and opposing efforts to build barriers to exercise this right, and is substantially likely to harm individual LWV-PA members who cast mail-in ballots.

21. Discarding ballots, including for minor errors in declarations, would also undermine LWV-PA's voter-advocacy efforts by leading some voters to believe that voting is pointless because their ballots will not be counted. This sense of futility will likely depress turnout in future elections and make it more difficult for LWV-PA to carry out its mission of encouraging the informed and active participation of citizens in government.

22. Moreover, discarding ballots, including ballots with minor errors in declarations, will force LWV-PA to dedicate additional resources to voter education efforts, at the expense of other organizational priorities. In the short term, news that boards of elections are rejecting mail-in ballots, including for minor inaccuracies in declarations, or for any other reason, will likely contribute to more voters asking LWV-PA staff questions about whether their ballots will count and how (if at all) they can cure these errors. These questions will result in LWV-PA staff spending additional time and resources responding that could have been dedicated to other efforts.

23. Moreover, the rejection of mail-in ballots, including for minor inaccuracies in declarations or of any other reason, will force LWV-PA, in an effort to promote the informed and active participation of citizens in government, to dedicate a larger share of its limited sources to voter education efforts. LWV-PA's resources are limited, those efforts will necessarily come at the expense of, for example, voter registration and other efforts.

24. Adrian Seltzer is also a LWPA member. She lives in Montgomery County. She voted by mail and her ballot was accepted without any issues.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th of November, 2020 in Pittsburgh, Pennsylvania.

Terrie E. Griffin